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ATTORNEYS FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE: §
§
HIGHLAND SELECT §
EQUITY MASTER FUND, L.P. § CASE NO: 23-31037-swe7
§ (Chapter 7)
DEBTOR. §

**DEBTOR'S UNOPPOSED MOTION TO EXTEND
DEADLINE FOR FILING SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

TO THE HONORABLE SCOTT W. EVERETT, U.S. BANKRUPTCY JUDGE:

Highland Select Equity Master Fund, L.P. (the “Debtor”) files its Unopposed Motion to Extend Deadline for Filing Schedules and Statement of Financial Affairs (collectively, the “Schedules and Statements”) until June 16, 2023. In support thereof, the Debtor states as follows:

JURISDICTION

1. Pursuant to 28 U.S.C. §§ 1334 and 157, the Court has jurisdiction to hear this Motion. Pursuant to 28 U.S.C. § 157(b)(2)(A) and (O) the Motion presents a core proceeding.

BACKGROUND

2. This case was commenced by the filing of a voluntary petition under Chapter 7 of the bankruptcy Code on May 25, 2023 (“Petition Date”). The same day, an affiliate of the Debtor filed a Chapter 7 bankruptcy case with the Northern District of Texas, Dallas Division: *In re Highland Select Equity Fund GP, L.P.*, Case No. 23-31039-mvl7 (the “Highland GP Case”), which has been assigned to Judge Larson. Scott Seidel has been appointed Chapter 7 Trustee in both this case and the Highland GP Case (the “Chapter 7 Trustee”).

3. Another affiliate of the Debtor has had a Chapter 11 bankruptcy case pending in the Northern District of Texas, Dallas Division, before Chief Judge Jernigan for over 3 years: *In re Highland Capital Management, L.P.*, Case No. 19-34054-sgj11 (the “Highland Capital Case”). The Highland Capital Case is a complex case that has over 3800 docket entries. The Debtor and Highland GP intend to request these Chapter 7 cases to be reassigned to Judge Jernigan given her significant experience and institutional knowledge in the Highland Capital Case.

4. Currently, the deadline for the Debtor to file its Schedules and Statements is June 8, 2023. This case was filed on a somewhat expedited basis and the Debtor is still in the process of preparing the Schedules and Statements.

5. The 341 meeting is set for June 20, 2023. The Debtor and counsel are diligently working on the Schedules and Statements and require additional time to complete before the current deadline of June 8, 2023. The Debtor has conferred with the Trustee, and the Trustee does not oppose an 8-day extension of the deadline to file schedules and statements to June 16, 2023, which is 4 days before the 341 meeting.

RELIEF REQUESTED

6. Pursuant to Bankruptcy Rules 1007(b) and (c), the Debtor is required to file schedules and statements within fourteen days after the chapter 11 filing. As stated, the original due date for the schedules and statements is June 8, meaning that in order to prepare the schedules and statements, the Debtor must gather and synthesize information from books, records, and documents in a relatively short period of time.

7. The Debtor is diligently working on the schedules and statements but requests additional time to obtain the necessary information to complete them.

8. The Court has authority to grant an extension of the time for the filing of Schedules and Statements under Bankruptcy Rule 1007(c).

9. This Motion requests an extension of time to file the Schedules and Statements to June 16, 2023.

10. As stated above and set forth in the certificate of conference below, undersigned counsel has conferred with the Trustee regarding the relief requested herein in accordance with Local Rule 1007-1(b) and he is unopposed and agreeable to the requested extension.

WHEREFORE the Debtor requests that the Court enter an Order Granting Extension of Time to File Schedules of Assets and Liabilities, Statement of Financial Affairs, and Schedule of Executory Contracts and Unexpired Leases, and Top 20 Creditors beyond the current 14-day deadline, to and including June 16, 2023, without prejudice to the Debtor's right to seek an additional extension if cause so exists, and that the Court grant the Debtor such other and further relief as is just and proper.

Respectfully submitted,

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By: /s/ Hudson M. Jobe
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ATTORNEYS FOR DEBTOR

CERTIFICATE OF CONFERENCE

I hereby certify that on June 1, 2023, I conferred with Scott Seidel and was advised that the Trustee is unopposed to an extension of time to file the Schedules and Statements in this case to June 16, 2023.

/s/ Hudson M. Jobe
Hudson M. Jobe

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2023, a true and correct copy of the foregoing document was served via ECF electronic filing.

/s/ Hudson M. Jobe
Hudson M. Jobe